

***Ellington Broadcasting
P.O. Box 617
Webb, MS 38966***

June 12, 2017

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

To: Media Bureau

**Ellington Broadcasting's Response to Cable One's Clarification Letter
Regarding WHCQ-LD (MB Docket 17-96) & WPRQ-LD (MB Docket 17-58)
Petitions for Carriage**

I, David Ellington, d/b/a Ellington Broadcasting, licensee of WHCQ-LD and WPRQ-LD ask the Commission to accept this letter as a response to Cable One's letter of clarification filed on June 2, 2017. A certificate of service is shown in Exhibit #7.

Ellington Broadcasting is seeking must carry status for WPRQ-LD on the Cable One Cleveland, Mississippi system and for WHCQ-LD on the Clarksdale, Mississippi Cable One system. Ellington Broadcasting maintains that both stations are must carry qualified stations.

Instead of addressing the questionable data and comments made during their initial signal tests, which confused both Ellington Broadcasting and the Commission, Cable One merely claims to have performed new signal tests. These new tests were not asked for by the Commission and do not follow good engineering practices as required by the Commission for receiving a broadcast television signal. In fact, the manner in which Cable One conducted the new signal tests would surprise any broadcast engineer who subscribes to good engineering practices.

It's Doubtful That Cable One Conducted New Signal Tests In Response To The Commission's Request for Clarification.

The request for clarification letter sent from the Commission to Cable One and Ellington Broadcasting is dated May 23, 2017 and is postmarked May 23, 2017 from Washington, D.C. (See Exhibit #1)

Consequently, it's doubtful that Cable One could have conducted new signal tests on May 22, 2017 and May 23, 2017 in response to the FCC's letter. Cable One would not have been aware of the Commission's clarification request at that time and certainly did not conduct the signal tests for no reason. Therefore, Ellington Broadcasting is highly suspicious that any tests took place at all.

Cable One Did Not Contact Ellington Broadcasting Regarding The New Signal Tests.

Ellington Broadcasting was never notified nor invited by Cable One to witness the signal tests that Cable One claims it conducted on May 22, 2017 and May 23, 2017. If Cable One did conduct signal tests and were fully confident in their signal tests, why would they be against Ellington Broadcasting witnessing the tests? This lack of transparency calls into question Cable One's desire to conduct a fair and honest signal test for WPRQ-LD and WHCQ-LD.

The WPRQ-LD & WHCQ-LD Signal Tests Lack Good Engineering Practices as Required by the Commission.

Cable One stated in the clarification letter on pages 2 & 3 that they used a "high gain VHF /UHF diamond antenna" for the signal tests. This statement is completely false, because in exhibit 1 and exhibit 2 of Cable One's letter, they listed a consumer grade "Mediasonic HOMEWORX HDTV Outdoor Antenna" as the antenna used for both signal tests. This antenna is a **very low 3dB** gain antenna made for consumer home use and can be purchased for as little as \$24.99 from Walmart. (See Exhibit #2)

In addition, Cable One states in exhibit 1 and exhibit 2 of the letter that the Mediasonic HOMEWORX **HDTV** Outdoor Antenna was installed in **1994**. By visually looking at both towers there is no sign of this antenna installed on the towers. HDTV wasn't even broadcast in 1994 in the United States, therefore, it's not possible an antenna that is marketed by retailers for consumer home HDTV reception was installed in 1994 on two cable television receive towers.

It is amazing that a cable company would conduct a television broadcast signal test using a consumer home antenna when the majority of VHF antennas located on their towers are high gain diamond quad array antennas. Therefore, Cable One's selection of a low gain consumer grade Walmart antenna is a failure to use good engineering practices in performing the signal tests of WPRQ-LD and WHCQ-LD.

The Poor Signal Test Results Claimed by Cable One Are Not Experienced By Other Cable Systems Receiving WPRQ-LD and WHCQ-LD.

In exhibit 1 and exhibit 2 of the clarification letter, Cable One describes WPRQ-LD and WHCQ-LD's picture quality as **"extremely poor, no picture at all, picture not viewable."** The only way Cable One can make such a statement is due to their own inability to conduct a fair signal test using good engineering practices. The facts are that WPRQ-LD and WHCQ-LD provide over the air signals of good quality to many other cable systems in the region.

WPRQ-LD is carried on three cable systems in the Mississippi Delta region of Mississippi and in Arkansas. WPRQ-LD provides an over the air signal of good quality to all the cable systems. For example, Suddenlink Communications in Helena-West Helena, Arkansas receives an over the air signal of good quality from WPRQ-LD at an approximate distance of 26 miles from the WPRQ-LD transmit location.

WHCQ-LD is carried on five cable systems in the Mississippi Delta region of Mississippi and provides an over the air signal of good quality to all cable systems. For example, Suddenlink Communications in Greenville, MS receives WHCQ-LD's over the air signal of good quality at an approximate distance of 34 miles. Another example, Belzoni Cable in Belzoni, MS, receives WHCQ-LD's over the air signal of good quality at an approximate distance of 41 miles. In addition, Ellington Broadcasting has an antenna installed in Clarksdale, MS at its WPRQ-LD transmit location that is used to monitor WHCQ-LD's over the air signal. The antenna is a single VHF 12dB gain Yagi installed at a height of 150ft. The Yagi antenna receives an over the air signal of good quality at 33 miles away from the WHCQ-LD transmit site.

Based on these real world facts, the signal tests results and statements made by Cable One concerning the reception of WPRQ-LD and WHCQ-LD should be considered invalid.

Cable One Has Not Afforded WPRQ-LD and WHCQ-LD The Same Treatment As Other Stations Received At Their Headend Sites.

Cable One refuses to use the proper cable grade receive antennas for receiving WPRQ-LD and WHCQ-LD. The proper receive antennas are high gain diamond quad arrays which Cable One has afforded other stations. According to a Wade Antenna data sheet, the diamond quad arrays have a gain of **17.5dB** which is a much higher gain than the **3dB** Walmart consumer home antenna used by Cable One for the new signal tests of WPRQ-LD and WHCQ-LD. **(See Exhibit #3)**

Cable One's Cleveland, MS receive tower has three VHF diamond quad array antennas placed near the top of the tower. **(See Exhibit #4)** Diamond quad array antennas have been the standard VHF receiving antennas in the cable industry for many years. Moreover, Cable One's Cleveland, MS tower also contains a high gain UHF

Paraflector antenna that is receiving a distant “non-qualified” LPTV UHF station, WNBD-LD, licensed to Grenada, MS. This high gain Paraflector antenna has a gain of 15.5dB – 17dB depending on UHF channel. **(See Exhibit #5)** Again, this professional cable grade Paraflector antenna provides an antenna gain much greater than the Walmart consumer home antenna. Consequently, it is only fair that WPRQ-LD is provided the same treatment Cable One has given to other stations. Fair treatment of WPRQ-LD calls for Cable One to provide WPRQ-LD with a high gain VHF diamond quad array antenna precisely peaked as others have been provided by Cable One in Cleveland, MS.

Cable One’s Clarksdale, MS tower contains four high gain VHF diamond quad array antennas for receiving VHF broadcast stations. **(See Exhibit #6)** WHCQ-LD was only provided a 3dB gain Walmart consumer home antenna for the new signal test in Clarksdale, MS. WHCQ-LD should be afforded the same treatment as the other stations for which Cable One has provided diamond quad array antennas. Therefore, fair treatment of WHCQ-LD calls for Cable One to provide WHCQ-LD with a high gain VHF diamond quad array antenna precisely peaked as others have been provided by Cable One in Clarksdale, MS.

There is a good reason that cable systems have for years installed high gain diamond quad arrays for reception of VHF television stations. Cable systems seek the best possible signal and the VHF high gain diamond quad arrays accomplish that goal. So, if it’s in Cable One’s best interest to install these antennas for other stations, it should be in its best interest now to install them for WPRQ-LD and WHCQ-LD to receive the best possible signals.

Conclusion

During this process, Cable One has proven repeatedly they have no desire to conduct a fair and honest signal test. Look no further than in the initial opposition filing from

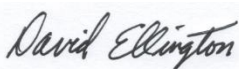
Cable One where they actually claimed to perform signal tests on WPRQ-LD and WHCQ-LD at locations where these stations have been received and carried on Cable One for decades and yet claimed there was no signal. This action by itself should be enough evidence that Cable One is trying everything that it can to stop WPRQ-LD and WHCQ-LD from receiving must carry status. The latest batch of new signal tests presented by Cable One in the clarification letter is just more of the same behavior.

Ellington Broadcasting has made a sincere effort to present the Commission with straightforward real world facts. It is Ellington Broadcasting's desire that these facts will override the smokescreen that Cable One has created during this process.

Therefore, Ellington Broadcasting asks the Commission to grant carriage to WPRQ-LD on the Cable One Cleveland, MS system and WHCQ-LD on the Clarksdale, MS Cable One system. Ellington Broadcasting also asks the Commission to require Cable One to provide new high gain VHF diamond quad array antennas precisely peaked to receive WPRQ-LD and WHCQ-LD along with new coaxial cable. We ask the Commission to place this requirement on Cable One because if it is left up to Cable One's discretion, Ellington Broadcasting will almost certainly not be afforded the proper receive antenna due to Cable One's past behavior concerning over the air reception of WPRQ-LD and WHCQ-LD.

Finally, I appreciate the Commission's time spent concerning this important matter. I assure the Commission that I have presented the facts as I believe them to be in a true and honest manner.

Sincerely,

A handwritten signature in cursive script that reads "David Ellington". The signature is written in dark ink on a light-colored background.

David Ellington
Ellington Broadcasting

Exhibit #1

The postmark date of May 23, 2017 is shown on the envelope containing the FCC's clarification request of Cable One.



Exhibit #2

The low gain consumer home antenna in which Cable One used for the signal tests of WPRQ-LD and WHCQ-LD is shown available at Walmart for \$24.99.

All

Search

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Mediasonic HOMEWORX HW27UV HDTV Outdoor Antenna


★★★★★
Write a review

Q&A

By: Mediasonic

f t p





\$24⁹⁹

Sold & shipped by **Mediasonic**

Free shipping

Or get it by Friday, Jun 9 with faster shipping options [Shipping options](#)

Free pickup not available from this seller

Protect your purchase with a Care Plan ?

+ Add 2-Year Protection \$2.00

Quantity: 1 ▾

Add to Cart

Add to List

Add to Registry

Exhibit #3

Shown below are the Wade Antenna specifications of the cable television VHF diamond quad log periodic receiving antenna. Cable One has a combined total of 7 diamond quad arrays installed in Cleveland, MS and Clarksdale, MS. However, WPRQ-LD and WHCQ-LD were only afforded a \$24.99 Walmart low gain consumer home antenna for reception at both locations.



Model WL7-13/DQ Channels 7-13 Diamond Quad Log Periodic

Series: WL Series

The WL7-13/DQ is a rugged high band diamond quad log periodic array for channels 7 to 13, combining high gain with narrow vertical and horizontal beam width. Engineered for maximum gain and superior side lobe performance, this array will significantly reduce the level of interfering signals. Where specific sources of interference can be identified, a custom designed array will ensure optimum rejection.

Gain: 17.5 dBi
Frequency: 174-216MHz
Channels: 7-13
HPBW Horizontal: 22°
HPBW Vertical: 24°
Impedance: 75 ohm
Polarization: Horizontal or Vertical
Connector Type: F Connector

Dimensions: 96" L (243.8 cm L)

Weight: 230 lbs

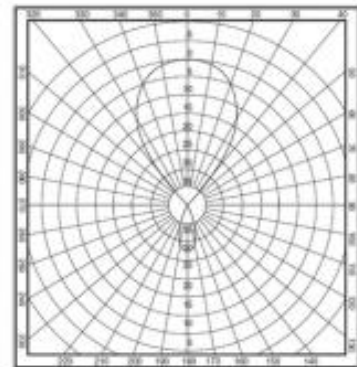


Exhibit #4

Recent photos of Cable One's Cleveland, MS headend tower showing the high gain VHF diamond quad array antennas installed on tower.



Exhibit #5

Shown below are the Kathrein specifications of the high gain Paraflector UHF antenna. Cable One in Cleveland, MS is using this type of high gain UHF antenna to receive a distant “non-qualified” UHF LPTV station, yet only affording WPRQ-LD a Walmart consumer home antenna for reception of WPRQ-LD in Cleveland.

PR-TV series PARAFLECTOR® ANTENNA 470—806 MHz, 15.5 TO 17 dBd gain

KATHREIN

The KUSA PR-TV series Paraflector antennas are designed for professional receive and low-power transmit applications in the 470—806 MHz spectrum. These antennas are available for any specified single 6 MHz UHF-TV channel.

Features include:

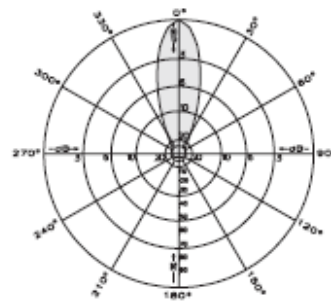
- High gain, half parabolic design.
- Lower weight and surface area than a parabolic dish or grid.
- Very rugged construction using anodized aluminum pipe, tubing and castings; plus stainless steel hardware and fastenings.
- Weather resistant foam-filled broadband feed assembly requires no pressurization. Easily replaced for frequency changes.
- Compact packaging for standard U.S. express services.

Specifications	
Frequency range	470—806 MHz
Bandwidth	Any 6 MHz UHF-TV channel
Gain	15.5 to 17 dBd (depending on channel)
Impedance	50 ohms
VSWR	<1.2:1
Polarization	Horizontal or vertical
Front-to-back ratio	25 dB
Maximum input power	100 watts (at 50°C)
H-plane beamwidth	24 degrees (half-power)
E-plane beamwidth	16 degrees (half-power)
Connector	N female
Weight	38 lb (17.2 kg)
Dimensions	68 x 36 x 18 inches (1727 x 914 x 457 mm)
Wind load at 93 mph (150 kph)	
Front / side	134 lbf / 72 lbf (594 N) / (320 N)
Wind survival rating*	100 mph (160 kph)
Shipping dimensions	40 x 36 x 7 inches (1016 x 914 x 178 mm)
Shipping weight	47 lb (21.3 kg)
Mounting	Mounting kits available for masts of 2.375 to 4.5 inch (60 to 114 mm) OD.

* Mechanical design is based on environmental conditions as stipulated in TIA-222-G-2 (December 2009) and/or ETS 300 019-1-4 which include the static mechanical load imposed on an antenna by wind at maximum



(Shown horizontally polarized)



Typical azimuth pattern (E-plane)

Exhibit #6

Recent photo of Cable One's Clarksdale, MS headend tower showing many high gain VHF diamond quad array antennas installed on tower.

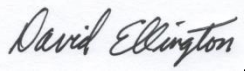


Exhibit #7

Certificate of Service

I hereby certify that a copy of this response was sent to Cable One on June 12, 2017 via USPS Certified Mail to the following address:

Cable One
2247 Commerce Street
Grenada, Mississippi 38901

Signature: _____  _____

David Ellington